

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AVESHKA, INC.	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 1:14-cv-01006 GBL-IDD
	:	
GLOBAL RECORD SYSTEMS, LLC	:	
	:	
Defendant.	:	

MOTION FOR PROTECTIVE ORDER

Defendant Global Record Systems, LLC, by counsel, and non-party Sandra Garrett, pursuant to Fed. R. Civ. P. 26 and 30, hereby move for a protective order to limit any resumed deposition of Sandra Garrett, which began on April 1, 2015, or second deposition of Sandra Garrett, to (1) subject matter not encompassed by the November 6, 2014 Notice of Post-Judgment Deposition on Oral Examination, attached as Exhibit 1 to Defendant’s Opposition to Motion for Sanctions and to Compel Continuation of Deposition (filed at Docket 43), (2) subject matter not encompassed by any other Fed. R. Civ. P. 30(b)(6) notice issued by Plaintiff to Defendant in this case, and (3) subject matter properly inquired about pursuant to Fed. R. Civ. P. 26.

GRS and Ms. Garrett incorporate herein in full the contemporaneously-filed Memorandum in Support of Motion for Protective Order.

GLOBAL RECORD SYSTEMS, LLC
SANDRA GARRETT
by Counsel

/s/ Stephen D. Charnoff
Stephen D. Charnoff (VSB No. 65329)
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*Counsel for Defendant Global Record Systems, LLC
and non-parties Sandra Garrett, Bruce Garrett, and
Julie Garrett*

CERTIFICATE OF CONFERRAL

Counsel hereby certifies that counsel, in good faith, conferred with opposing counsel in an effort to resolve this discovery-related motion without court action.

/s/ Stephen D. Charnoff
Stephen D. Charnoff

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2014, I will (1) hand-deliver this pleading to Marc Busman, Esq. at 7012 Wolf Run Shoals Rd., Fairfax Station, Virginia, 22039 and (2) electronically file this pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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GLOBAL RECORD SYSTEMS, LLC
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by Counsel

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